## Rich\_LaCasse@nm.blm.gov 08/14/2003 12:07 PM

To: Group Ow-Docket@EPA

cc:

Subject: Attention Docket ID No. OW-2003-0063

I strongly support the position of the EPA in that the application of pesticides, if done according to the label of the pesticide, does not constitute a discharge of a pollutant that requires a National Pollutant Discharge Elimination System (NPDES) permit under the Clean Water Act.

Pesticides labeled for application to and around water have already been through extensive research and testing to determine their safety for this application. Requiring an additional permit is time consuming, expensive, and will do nothing to increase the safety of the water supply in this country. It is just additional "red tape" that we in government do not need to impose. We have serious issues with the advance of diseases such as "West Nile Virus" and the increase of "Noxious Weeds" such as Saltcedar (Tamarix spp.) that need to be addressed in a timely and economical fashion. Requiring additional permits that accomplish nothing just relegates us to a quagmire of inaction.

Paralysis by analysis is costing tax payers in this country valuable dollars that can be used more effectively elsewhere.

I encourage you to not require a NPDES permit to apply pesticides to waterways.